

IBM

FEB 11 1991

Mintzer

International Business Machines Corporation

208-262 Harbor Drive
P.O. Box 10501
Stamford, CT 06904-2501
203/352-7000

February 8, 1991

Michael Mintzer, Esq.
Office of Regional Counsel
U.S. EPA, Region II
26 Federal Plaza
New York, NY 10278

Mr. Joel Singerman, Chief,
Western NY Remedial Action Group
Emergency & Remedial Response Div.
U.S. EPA, Region II
26 Federal Plaza
New York, NY 10278

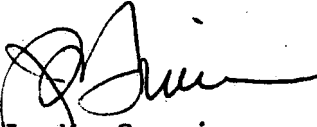
SUBJECT: Response to EPA Region II questionnaire

REFERENCE: Tri-Cities Barrel Superfund Site

Dear Sirs:

Enclosed is the IBM response to the Request for Information submitted by the Government by letter dated December 17, 1990. As per agreement with Mr. Mintzer for an extension of time to investigate and respond, the enclosed response information is hereby submitted on behalf of the IBM Corporation.

Sincerely yours,


J. K. Guerin
Staff Counsel

Enclosures

IBM Response to EPA Request for Information Regarding
the Tri-Cities Barrel Superfund Site

- 1a. International Business Machines Corporation
- 1b. IBM is a corporation organized under the laws of New York State
- 1c. Mr. John F. Akers, Chairman
IBM Corporation
Old Orchard Road
Armonk, New York 10504

Mr. Jack D. Kuehler, President
same address as above
- 1d. The IBM Corporation has multiple subsidiaries, but none was involved with nor had responsibilities relating to the Tri-Cities Barrel Superfund site other than the parent IBM Corporation.
- 1e. Not applicable
- 1f. Other than the IBM Corporation, no other corporation or company related to IBM was involved.
- 2. The IBM Corporation owns and operates two manufacturing facilities within the specified area. These facilities are:
 - a. IBM Corporation
Systems Technology Division
1701 North Street
Endicott, New York 13760
EPA ID No. NYD002233039
 - b. IBM Corporation
Federal Systems Division
Bodle Hill Road
Owego, New York 13827
EPA ID No. NYD986874501

Both of these facilities manufacture computer components, including circuit boards and substrates. The major operations are lamination, circuitization, drilling and plating. In the course of these operations, both hazardous and nonhazardous materials are generated.

- 3. See preceding paragraph under Question 2, above.
- 4. During the Applicable Period, IBM Endicott transacted business with the Tri-Cities Barrel Company during the years 1973 to 1983. From 1973 through 1976 and from 1982 through July of 1983, these transactions were limited to the purchase of new drums exclusively.

During the period 1977 through 1981, IBM Endicott purchased new

drums and shipped empty drums for reclamation and return to IBM. IBM Endicott estimates that the annual dollar volume of these transactions were insignificant.

Drums destined for reconditioning during the Applicable Period were emptied by IBM personnel and the contents removed to the extent possible by pouring or pumping etc. It was IBM Endicott's practice to clean/remove drum contents before delivery for reconditioning.

- 5a. Exact dates for each transaction are not available. Due to the relative age of the transactions, most of these records no longer exist. At present only a handful of documents have been discovered that relate to transactions with Tri-Cities Barrel. The documents uncovered to date indicate activity for the years 1979 and early 1980s.
- 5b. To the best of our knowledge, both DOT 17-E and 37-M 55 gallon drums were involved in these transactions.
- 5c. These transactions included both the purchase of new drums and the reconditioning of empty drums.
- 5d. As previously stated, to the best of our employees' recollections and as documented in the attached records, containers or drums sent to Tri-Cities Barrel were empty. It was IBM Endicott's practice to clean/remove the contents of the drums/containers to the extent possible.
- 5e. The empty drums which were sent to Tri-Cities Barrel may have previously contained any of a number of virgin chemicals. The attached internal memorandum dated March 1, 1983 contains a list of those chemicals.

At present we have not been able to discover any additional information relating to chemical content, physical state, characteristics, or written analyses of these chemicals, including any material safety data sheets used or created during the Applicable Period.

- 5f. Drum or container contents were removed to the extent possible by pouring or pumping, cleaning and removing.
- 5g. Records of transactions during the Applicable Period with Tri-Cities Barrel Company that could be found are attached herewith.
- 5h. The following IBM personnel may have knowledge of IBM's business transactions with Tri-Cities Barrel Company:

William Dinga (retired)
FOIA EX. 6

Former Mgr. of Chemical Distribution Center

Former Mgr. of Chemical Distribution Center

John S. Lubert

FOIA EX. 6

Former Mgr. of Chemical Dist. Ctr.

Martin J. Amorese

FOIA EX. 6

Former Technician, Chemical Dist. Ctr.

Walter S. Davis (retired)

FOIA EX. 6

Former Project Mgr., Chemical Dist. Ctr.

Joseph Rompala (retired)

FOIA EX. 6

Former Technician, Chemical Dist. Ctr.

Richard C. Hinkley

FOIA EX. 6

Mgr. of Purchasing Dept.

Alvin H. Williams III

FOIA EX. 6

Buyer, Purchasing Dept.

5i. No. Not applicable

6. The nature of the business relationship between IBM Endicott and Tri-Cities Barrel Company is as set forth in responses 4 and 5 herein. IBM has been unable to uncover, as yet, any contracts or agreements other than the enclosed records attached hereto.

7. The following persons were consulted in preparing the responses to this Request for Information:

Kearney J. Stickles

FOIA EX. 6

Former Mgr. of Chemical Dist. Ctr.

James E. Franklin
Environmental Engineer
IBM Endicott
607-755-6173

Michael Finsel
Commodity Group Administrator,
Purchasing Dept
IBM Endicott
607-757-5105

8. See responses to Questions 5h and 7.
9. IBM has insurance policies with respect to which it retains the right to assert claims for CERCLA liability. These policies are divided between a primary carrier, the Zurich Insurance Company, and multiple excess carriers. Since the the number and identity of the excess carriers as well as the amounts of insurance may vary from year to year, if further information is required, please contact the Zurich Insurance Co., 800 N. Vogt Drive, Schaumburg, Ill. 60196-1056.
10. Not applicable.
11. We assume that Question 11 is intended to ascertain whether the corporation is solvent and financially responsible. We certify that the IBM Corporation is financially responsible.

IBM Endicott does not file separate income tax reports. Such documents are filed by the IBM Corporation for all of its operating divisions and subsidiaries.

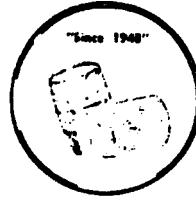
If additional information is required, please contact the undersigned.
12. IBM is unaware, at this time, of any additional sources of information relating to Tri-Cities Barrel Superfund Site. IBM intends to continue reviewing its files and records for pertinent information. When and if supplementary information is uncovered, IBM will amend its responses to this Request for Information.

TRI-CITIES BARREL CO.

P. O. Box 88
Port Crane, N.Y.
Zip 13833

Telephone
607-648-5507

WOODEN
BARRELS



RECONDITIONED
DRUMS

November 8, 1979

International Business Machines Corp.
Contract Service Purchasing
D/478 607-3
Centre Plaza, Binghamton, N.Y. 13902

Attention: Al Williams

Subject: Quotation Reply--SW 58477

We have discussed your situation in detail concerning the 3000 DOT 6 D's and 37 M's. I believe I had mentioned last week in our telephone conversation some of the problems we are all facing with environmental control. We would, therefore, have to charge you for the removal and disposal of these drums and the residue materials they contain. All disposal of the residue and the drums will meet State and Federal regulations.

We would be interested in this contract only if I B M were to pay us \$3.45 per drum to dispose of and destroy same. The only problem we foresee is the 30 day removal period. We have two alternatives in properly handling these--both require rinsing the interiors, then the drums are either disposed of by hauling to an authorized landfill or by taking them apart, separating the drum from the liner. The liner is then taken to a landfill and buried, leaving a light steel drum which is resaleable. If we can be of any assistance please feel free to call or visit us. We would be more than happy to answer any questions you might have.

Very Truly Yours
Mary Garner

Interoffice Memorandum

To: John Hubert		Div./Dept. No.	Internal Zip	1	Subject and/or Reference scraper drums -
B/O No.	City & State	Date 11/21/79			

John - Mr. Stickle initiated an inquiry for drum removal - We have no takers to buy them - and Tri-Cities will take them if we pay 3.45 ea. (attached letter)
Please give a call with your wishes in this matter.

Thanks.

FOLD

Addressee - Prepare reply, detach remaining copies, and send Copy 3 to the return address		Area Code Tie Line, Tel. No. & Ext.		Reply
To (Return)		Div./Dept. No.	Internal Zip	
B/O No.	City & State	Date		

Al Williams
Contract Services
Purchasing
P/478 607-3
Centre Plaza.

Note, 2 additional vendors are being investigated by Al Williams now
Jack L.

rec'd 12/10/79

Kearney - contact in Syracuse

9-18-79

(12)

SALE OF

SUBJECT: ^ USED LINED DRUMS - BOTH DOT 6D & 37M
SPEC. CONTAINERS.

4 THERE ^{ARE} APPROX 3000 LINED DRUMS
LOCATED IN THE DRUM STORAGE LOT ADJACENT TO
THE WTP. - THESE DRUMS CONSIST OF APPROX 15% DOT
6D AND 85% DOT 37M SPEC. CONTAINERS - THESE DRUMS
HAVE CONTAINED A VARIETY OF MATERIALS OF WHICH
MAYBE ALL ARE OF A CORROSIVE NATURE - THE
BUYER WOULD BE RESPONSIBLE FOR ANY RESIDUE STILL
CONTAINED IN THESE DRUMS AND CLEANING AND DISPOSAL WOULD
HAVE TO MEET ALL LOCAL - STATE AND FEDERAL REGULATIONS
REGARDING DISPOSAL OF WASTE MATERIALS - BUYER WOULD
BE REQUIRED TO LOAD AND TRANSPORT ALL DRUMS WITH
ASSISTANCE FROM EBM PERSONNEL - BUYER WOULD BE
BIDDING ON ENTIRE 3000 DRUMS AND WOULD BE REQUIRED
TO COMPLETE REMOVAL WITHIN 30 DAYS OF PAYMENT BY CERTIFIED
CHECK - DRUMS MAY BE INSPECTED DURING WORKING HOURS WITH
PRIOR APPROVAL OF DEPT 580

pursh - Al Williams

X2439

Name

Internal Zip

City & State

To: T. Morris

21-730/325

Tarrytown II

IBM

From Date : March 1, 1983
Name & Tie/Ext.: P. J. Angulas/6120
Title/Dept. Name : Chemical & Environmental Engineering
Internal Zip/City, State : 513/616-1
or U.S. Mail Address : GTD Endicott
ITPS Code :

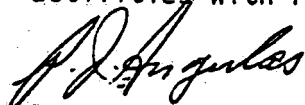
Subject : Tri-Cities Barrel Company - past activities

Reference : Your phone request

In answer to your request, to the best of our recollection empty drums which previously contained the following commodities have been recycled for IBM, Endicott by Tri-Cities Barrel Co.:

Enthone A-150
Isopropyl Alcohol
Phenoxy Coating
Dow Epoxy-Novolac
Methyl Chloroform
FREON
FREON/Isopropanol
Toluene
Methyl Isobutyl Ketone
Tetramethylbutyldiamine
Methylene Chloride
Xylene
Methyl Cellosolve Acetate
SCRAM (detergent)
Lacquer thinner
Trichloroethylene

To the best of our knowledge, the above represents all past activities with respect to Tri-Cities Barrel Co.


P. J. Angulas

PJA/dc

cc: D. Casale 513/616-1
J. Franklin 513/616-1
K. Stickles 935/095-1

TRI CITIES BARREL

YEAR	392	395	610	TOTAL
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1980		64	11	\$75 K
1981				UNK
1982		30		30
1983	38	30		68
1984		31		31
1985				0
1986				0
1987				0
1988				0
1989				0

LOCAL SNUM = 612080

CODE 392 = CONTAINER, CARD (DEPT 439)
395 = CONTAINERS, MISC (DEPT 439)
610 = PAINT (DEPT 478)